



SPRING REGULATORY SCIENCES

Linda Hollis
Document Processing Desk (AMEND)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive
Room S-4900, 4th Floor
Arlington, VA 22202

August 13, 2021

Re: Fast-track labeling amendment to update precautionary statements for Sysstem-Cal Blue, EPA Reg. No. 48222-15

Dear Ms. Hollis:

Agro-K Corporation has failed the human health assessment from the state of California for Sysstem-Cal Blue (EPA Reg. No. 48222-15) with the reason being, "The product label does not adequately identify the potential corrosiveness of the Category I eye irritation hazard." The current EPA approved label does not indicate "corrosive" in the precautionary statements. The EPA human health risk assessment for this product indicates that guideline 870.2400 was waived due to formulation pH < 2. The EPA label review manual indicates that the "Corrosive" keyword is only required "if corrosive effects were observed during the study." Agro-K Corporation agrees to add this keyword if the agency supports it.

The following documents are enclosed to support this Application:

Cover Letter
EPA Form 8570-1
Label Final
Label Changes Tracked

If you have any questions regarding this submission, please contact me at 877-227-2597.

Sincerely,

Jeremy D. Malone
Agent
Spring Regulatory Sciences
Consultant for: Agro-K Corporation